

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

AIMS INSTITUTE, PLLC, *et al.*,

*Plaintiffs,*

v.

MERRICK GARLAND, *et al.*,

*Defendants.*

Civil Action No. 4:22-CV-02396

**JOINT PROPOSED SCHEDULE**

In accordance with the Court's January 9, 2023 Order to Report, Plaintiffs AIMS Institute, PLLC et al. and Defendants, Attorney General Merrick Garland, et al., hereby propose a schedule for resolving this case. As the Court is aware, it authorized Plaintiffs to take a 30(b)(6) deposition of Defendants in this case. Plaintiffs took the deposition on January 5, 2023. The parties agree that no further discovery is needed in this matter before dispositive motions. The parties propose the following deadline for amending the pleadings and a revised dispositive motion briefing schedule:

2. By January 24, 2023, Plaintiffs will file any amendment to the pleadings. (*Defendants consent to the filing of an amended complaint but reserve all defenses*).

3. By February 24, 2023, Plaintiffs will move dispositively.

4. By March 24, 2023, Defendants will respond and move dispositively. (*The parties stipulate this is the Defendants' deadline for responding, and that the dispositive motion will constitute a response, to any amended pleading*).

5. By April 10, 2023, Plaintiffs may file a response/reply.

The parties believe that the foregoing proposed schedule will lead to the efficient resolution of this matter.

DATED: January 13, 2023

Respectfully Submitted,

s/Jimmy A. Rodriguez  
Jimmy A. Rodriguez  
Assistant United States Attorney  
Southern District of Texas  
Attorney in Charge  
Texas Bar No. 24037378  
Federal ID No. 572175  
1000 Louisiana, Suite 2300  
Houston, Texas 77002  
Tel: (713) 567-9532  
Fax: (713) 718-3303  
[jimmy.rodriguez2@usdoj.gov](mailto:jimmy.rodriguez2@usdoj.gov)

Of counsel:  
Glenn Gray  
Attorney  
Drug Enforcement Administration  
Office of Chief Counsel, Administrative and  
General Law Section  
8701 Morrisette Dr., Springfield, VA 22152

Attorneys for Defendants

/s/ Shane Pennington  
Shane Pennington  
Vicente Sederberg LLP  
1115 Broadway, 12th Floor  
New York, NY 10010  
T: (917) 338-5455  
F: (303) 860-4505  
[s.pennington@vicesederberg.com](mailto:s.pennington@vicesederberg.com)

Kathryn L. Tucker  
Director of Advocacy  
206-595-0097  
[kathryn@yournpa.org](mailto:kathryn@yournpa.org)  
National Psychedelic Association

Matthew C. Zorn  
Yetter Coleman LLP  
mzorn@yettercoleman.com  
811 Main Street, Suite 4100  
Houston, TX 77002  
T: (713) 632-8000  
F: (713) 632-8002

Attorneys for Plaintiffs

**CERTIFICATE OF SERVICE**

I certify that on January 13, 2023, a true and correct copy of the foregoing was filed with the United States District Clerk for the Southern District of Texas and electronically served on all counsel of record via the District's ECF system.

s/ Jimmy A. Rodriguez  
Jimmy A. Rodriguez  
Assistant United States Attorney